

September 08. 2021

By Electronic Filing

Honorable Petrese B. Tucker
U.S. District Court for the
Eastern District of Pennsylvania
16613 U.S. Courthouse
601 Market Street
Philadelphia, PA 19106

RE: Lawrence v. DOAR, Inc., 21-CV-3269

Our firm represents plaintiff Jennifer Lynn Lawrence in the above-referenced action. We write in response to Defendant's request for a stay of deadline to file motions under Federal Rule of Civil Procedure 12(b)(6).

While we agree with DOAR's letter that this case arises from the second impeachment trial of former President Donald J. Trump, we vehemently disagree that this case has no connection to the state of Pennsylvania and therefore find DOAR's letter to be premature and improper.

The Supreme Court has consistently found jurisdiction based on substantial connections to the state, *See e.g., Ford Motor Co. v. Montana Eighth Judicial District Court*, 592 U.S. __ (2021). DOAR has spent substantial resources in the state through its habitual business dealings and opened itself to litigation in the state. In addition, Plaintiff's reputation was damaged in the state of Pennsylvania, thus meeting the *Ford* standard. DOAR conducts its businesses in Pennsylvania, it spread falsehoods about Plaintiff in Pennsylvania, and it caused harm to Plaintiff in Pennsylvania. The interest of the Eastern District of Pennsylvania in adjudicating this case is clear. Plaintiff plans to submit discovery requests to Defendant to fully establish this Honorable Court's interest in adjudicating the case.

Plaintiff also disputes DOAR's claim that this lawsuit is subject to dismissal for failure to state a claim under Rule 12(b)(6). The absolute privilege that DOAR claims to possess protects legislators from liability for statements made in the course of lawmaking, not contract consultants seeking to maximize public outrage.

Accordingly, Plaintiff agrees for a stay on any Rule 12 motions until Defendant fully responds to Plaintiff's jurisdictional discovery requests.

Respectfully submitted,

/s/ Bruce L. Castor, Jr.

Bruce L. Castor, Jr.

cc: Elizabeth Seidlin-Bernstein